

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>SHEALONDRA BIBLE,</b>	§	<b>CIVIL ACTION NO. 4:21-cv-00804</b>
	§	
<b>Plaintiff,</b>	§	
<b>v.</b>	§	<b>JURY DEMANDED</b>
	§	
<b>DIRECT ENERGY, NRG, LLC</b>	§	
	§	
<b>Defendant.</b>	§	

**AGREED MOTION FOR CONTINUANCE**

Defendant Direct Energy, GP, LLC (“Direct Energy” or “Defendant”) files this Agreed Motion for Continuance respectfully stating as follows:

1. This is an employment discrimination lawsuit. Plaintiff filed this lawsuit on March 11, 2021.
2. The current scheduling order sets the following upcoming deadlines:
  - Dispositive and Non-dispositive Motions: May 26, 2022
  - Mediation or Settlement Conference: July 12, 2022
  - Deadline for Joint Pretrial Order and *Motions in Limine*: August 11, 2022
  - Docket Call: September 19, 2022
3. The Parties have engaged in some discovery but have been unable to complete discovery, including Plaintiff’s deposition, due to various scheduling conflicts and Plaintiff’s illness. Most recently, the Parties anticipated completing Plaintiff’s deposition in early May (after they were unable to secure her deposition earlier, including in April 2022) in order to meet the current pretrial deadlines, including for dispositive motions. However, Plaintiff has had additional scheduling conflicts and the Parties are not able to complete Plaintiff’s deposition until June 16, 2022. Plaintiff’s deposition is critical to Defendant’s ability to fully assess Plaintiff’s claims for dispositive motions and potential settlement.

4. In light of the additional discovery that is needed, the Parties respectfully request a continuance to complete Plaintiff's deposition and exhaust other pretrial matters, including dispositive motions that may eliminate or narrow the issues for trial and/or settlement. The Parties propose the following new deadlines:

- Dispositive and Non-dispositive Motions: July 29, 2022
- Mediation or Settlement Conference: September 23, 2022
- Deadline for Joint Pretrial Order and Motions in Limine: October 28, 2022
- Docket Call: December 2, 2022

5. A proposed scheduling order reflecting the above deadlines is attached.

6. This Motion is filed in good faith and is not sought or presented for purposes of obstruction or delay, but rather so that justice may be done.

WHEREFORE, Defendant Direct Energy, GP, LLC respectfully requests that the Court grant this Motion, enter an Amended Scheduling Order reflecting the dates proposed above, and grant it such other and further relief to which it is just entitled.

Respectfully submitted,

/s/ Marlene C. Williams

Marlene C. Williams

State Bar No: 24001872

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ATTORNEYS FOR DEFENDANT  
DIRECT ENERGY, GP, LLC

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with Plaintiff's counsel concerning the relief and proposed dates requested in this Motion. Plaintiff agrees to the proposed dates and agrees to entry of an Amended Scheduling Order consistent with the relief requested in this Motion.

/s/ Marlene C. Williams  
Marlene C. Williams

**CERTIFICATE OF SERVICE**

I hereby certify that on May 6, 2022, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Southern District of Texas – Houston Division, using the electronic case files system of the court. The electronic case files system sent a “Notice of Electronic Filing” to the following CM/ECF participants:

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/s/ Marlene C. Williams  
Marlene C. Williams